

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RAMONA THURMAN BIVINS,)	
)	
Plaintiff,)	
)	CIVIL ACTION NO.:
vs.)	1:22-cv-04149-WMR
)	
FELICIA FRANKLIN, in her individual)	JURY TRIAL DEMANDED
and official capacities;)	
ALIEKA ANDERSON, in her individual)	
and official capacities;)	
GAIL HAMBRICK, in her individual)	
and official capacities; and)	
CLAYTON COUNTY, GEORGIA,)	
)	
)	
Defendants.)	

**DEFENDANT GAIL HAMBRICK AND CLAYTON, COUNTY,
GEORGIA’S CONSENT MOTION FOR AN EXTENSION OF TIME TO
REPLY IN SUPPORT OF THEIR MOTION TO DISMISS
PLAINTIFF’S COMPLAINT**

COME NOW, Gail Hambrick, in her individual and official capacities, and Clayton County, Georgia (“Defendants”), and moves this Court for an Order extending the time period for their Reply in Support of their Motion to Dismiss Plaintiff’s Complaint, through and including January 30, 2023, showing the Court as follows:

1. On October 17, 2022, Plaintiff filed her initial Complaint for Damages and Injunctive Relief against Defendants Felicia Franklin (“Franklin”), in her individual and official capacities, Alieka Anderson (“Anderson”), in her individual and official capacities, Gail Hambrick, in her individual and official capacities, and Clayton County, Georgia. [ECF. 1].

2. On November 22, 2022, Defendant Anderson filed her Answer to Plaintiff’s Complaint. [ECF No. 19].

3. On December 5, 2022, Defendants Hambrick and Clayton County filed their Motion to Dismiss Plaintiff’s Complaint. [ECF No. 22].

4. Upon motion on December 5, 2022 by Defendants Hambrick and Clayton County to stay all discovery [ECF No. 23], the Court entered an Order [ECF No. 24] on December 5, 2022 staying all discovery in this matter pending the final resolution of Defendants’ Motion to Dismiss.

5. On December 12, 2022, Defendant Franklin filed her Answer to Plaintiff’s Complaint. [ECF No. 25].

6. Plaintiff filed her response to Defendants Hambrick’s and Clayton County’s Motion to Dismiss Plaintiff’s Complaint on January 9, 2023. [ECF No. 33].

7. In light of numerous court deadlines in other matters, Defendants respectfully request a seven (7) day extension of time to file their Reply in Support of their Motion to Dismiss through and including January 30, 2023.

8. Counsel for Defendant conferred with counsel for Plaintiff regarding the relief sought in this motion, and Counsel for Plaintiff has agreed to the extension.

9. The requested extension will not prejudice any party and is sought in good faith and not for the purposes of delay or any other purpose contrary to the Federal Rules of Civil Procedure and the Local Rules of this Court.

WHEREFORE, Defendants respectfully request the Court grant their Motion for an Extension of Time to Reply in Support of their Motion to Dismiss Plaintiff's Complaint, extending the deadline to January 30, 2023.

A proposed Order is attached herewith.

Respectfully submitted this 20th day of January, 2023.

FREEMAN MATHIS & GARY, LLP

/s/ Kirsten S. Daughdril

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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), I hereby certify that the foregoing has been prepared in compliance with Local Rule 5.1(C) (Times New Roman font, 14-point).

This 20th day of January, 2023.

FREEMAN MATHIS & GARY, LLP

/s/ Kirsten S. Daughdril

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GAIL HAMBRICK, in her individual)	
and official capacities; and)	
CLAYTON COUNTY, GEORGIA,)	
)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2023, I electronically filed the above **DEFENDANTS' CONSENT MOTION FOR AN EXTENSION OF TIME TO REPLY IN SUPPORT OF DEFENDANT GAIL HAMBRICK AND CLAYTON COUNTY, GEORGIA'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT** with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

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/s/ Kirsten S. Daughdril

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